

**Hearing Date and Time: January 12, 2021 at 11:00 a.m. (prevailing Eastern Time)**

**Objection Deadline: January 5, 2021 at 4:00 p.m. (prevailing Eastern Time)**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENEVER HOLDINGS LLC,

Debtor.

Chapter 11

Case No. 20-12411 (JLG)

**NOTICE OF MOTION OF PLAINTIFF PACIFIC ALLIANCE ASIA  
OPPORTUNITY FUND L.P. TO MODIFY THE AUTOMATIC STAY  
TO PROCEED WITH STATE COURT LITIGATION, AND RELATED RELIEF**

PLEASE TAKE NOTICE that a hearing will be held on **January 12, 2021, at 11:00 a.m.** before the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004, to consider the Motion of Plaintiff Pacific Alliance Asia Opportunity Fund L.P. ("PAX") to Modify Automatic Stay (the "Motion"), attached to this

notice and requesting modification of the automatic stay to allow PAX to conclude its New York State lawsuit, Docket No. 652077/2017, pending before Justice Barry R. Ostrager, against Genever Holdings LLC (the “Debtor”), and to address any attendant claims by any other non-debtor third-parties that may be joined as parties, including but not limited to Bravo Luck Limited, up through entry of final judgment, but excluding enforcement of any such judgment as against the Debtor.

PLEASE TAKE FURTHER NOTICE that, in accordance with General Order M-543 dated March 20, 2020, the Hearing may be conducted telephonically. Any parties wishing to participate must do so telephonically by making arrangements through Court Solutions online at <https://www.court-solutions.com/>.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion shall be in writing, state with particularity the basis for the objection, and be filed with the Bankruptcy Court in accordance with the Local Rules of the Bankruptcy Court of the Southern District of New York (the “Local Rules”) by users of the Bankruptcy Court's case filing system, and by all other parties, and served in accordance with the Local Rules and upon the undersigned via electronic mail so as to be received no later than 7 days as required under the Local Rule 9006-1. Any such objection shall state with specificity the reason or reasons why the relief sought in the Motion should not be granted.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served the Court may enter the proposed order for the relief requested in the Motion, attached as an Exhibit to the Motion, without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice.

Dated: December 16, 2020  
New York, New York

Respectfully submitted,

O'MELVENY & MYERS LLP

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